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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
ISAUL REYES DELGADO,)
a/k/a SAUL,)
MANUEL FRANCO RAMOS,)
CARLA JO BRUMLEY,)
ALBINO GUERRERO ALVAREZ, and)
PEDRO BRAVO-MAGDALENO,)
a/k/a PEDRO MAGDALENO-BRAVO,)
Defendants.)

No. CR 09-346 VRW

~~PROPOSED~~ ORDER EXCLUDING
TIME FROM APRIL 16, 2009 THROUGH
July 2, 2009

The defendants, ISAUL REYES DELGADO, MANUEL FRANCO RAMOS, CARLA
JO BRUMLEY, ALBINO GUERRERO ALVAREZ, and PEDRO BRAVO-MAGDALENO,
represented by their attorneys, and the government, represented by Tarek J. Helou, appeared
before the Court on April 16, 2009 for the parties' initial status conference in district court.

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1 Defense counsel stated that they would file motions for discovery and bills of particulars, and
2 needed time to prepare those filings.

3 The matter was continued to July 2, 2009 at 2:00 p.m. for a hearing on the defendants'
4 motions for discovery and bills of particulars. Counsel for all defendants requested that time be
5 excluded under the Speedy Trial Act from April 16, 2009 through July 2, 2009 because they
6 needed that time to prepare their briefs and prepare for the hearing on their motions. The
7 government stated it had no objection to excluding time.

8 Based upon the representation of counsel and for good cause shown, the Court finds that
9 failing to exclude the time from April 16, 2009 through July 2, 2009 would unreasonably deny
10 the defendants the reasonable time necessary for effective preparation of their counsel, taking
11 into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further
12 finds that the ends of justice served by excluding the time from April 16, 2009 through July 2,
13 2009 from computation under the Speedy Trial Act outweigh the best interests of the public and
14 the defendant in a speedy trial. Therefore, IT IS HEREBY ORDERED that the time from April
15 16, 2009 through July 2, 2009 shall be excluded from computation under the Speedy Trial Act.
16 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

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19 DATED: _ April 28, 2009 _
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